



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

October 11, 2011

Re: Morgan County
MAHLE Engine Components USA, Inc.
2012 CEI
Correspondence (IWW)

Mr. Andrew Cole, Environmental Supervisor
MAHLE Engine Components USA, Inc.
5130 North State Route 60
McConnelsville, Ohio 43756

Dear Mr. Cole:

On July 25, 2011, I conducted a compliance evaluation inspection at MAHLE Engine Components located in McConnelsville, Ohio. Brad Temple, Dan Wing and you represented MAHLE Engine Components and accompanied me during the inspection. The purpose of the inspection was to determine MAHLE's compliance with NPDES Permit Number OIC00027*BD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111.

As a result of the inspection and review of our files, I have the following comments:

1. Part III, Item 5 of your NPDES permit requires you to periodically calibrate and perform maintenance on all monitoring and analytical instrumentation to insure accuracy of measurements.

The flow meters have not been calibrated on an annual basis.

2. Part III, Item 3 of your NPDES permit requires you to operate as efficiently as possible all treatment and control facilities necessary to achieve compliance with your NPDES permit.

There have been numerous NPDES permit violations since the last inspection. After reviewing the flow records for the last three years for MAHLE, the violations appear to be directly proportional with the increase of flow in the treatment system.

3. Ohio Administrative Code 3745-33-04 and Ohio Revised Code 6111.03 states "a permit shall not be renewed unless the director determines that the permittee is making satisfactory progress toward the achievement of all applicable limitations and has complied with the terms and conditions of the existing permit."

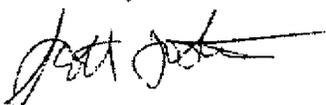
MAHLE Engine Components has had numerous permit violations. Ohio EPA will be unable to renew your permit until the plant returns to compliance. Please submit a compliance schedule showing how the company will bring the facility into compliance with their expired permit. Failure to return the facility to compliance in a timely manner may result in additional enforcement actions with Ohio EPA.

Attached is a copy of the inspection report. Due to the above comments, I rated the areas for Operations & Maintenance and Effluent Receiving Waters as **Marginal**. I rated the area for Flow Measurement as **Unsatisfactory**. MAHLE should take the appropriate actions to return the facility in compliance with all terms and conditions of the NPDES permit.

Please respond to this letter by October 19, 2011.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (614) 644-3469 or me for additional information.

Sincerely,



Scott Foster
Environmental Specialist 2
Division of Surface Water

SF/dh

Enclosure

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
DIC00027*BD	OH0127701	July 25, 2011	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Mahle Engine Components USA, Inc. 5130 North State Route 60 McConnelsville, Ohio 43756	9:00 AM	August 1, 2006
	Exit Time	Permit Expiration Date
	11:30 AM	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Andrew Cole, Environmental Supervisor	740-962-2040 Ext: 235
Name, Address and Title of Responsible Official	Phone Number
John Feather, Manager, Mahle North America	740-962-2040 Ext:303

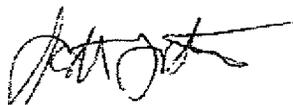
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>U</u> Flow Measurement	<u>S</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>M</u> Operations & Maintenance	<u>M</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u>N/A</u> Other
<u>N/A</u> Collection System		

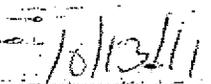
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

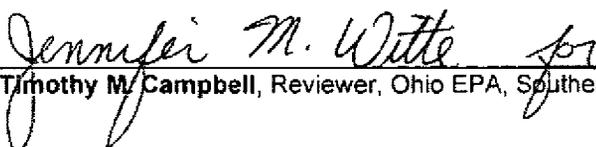
See Attached Letter.



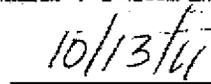
Scott Foster, Inspector, Ohio EPA, Southeast District Office



Date



Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office



Date